

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

CHEMONICS INTERNATIONAL, INC.

Plaintiff,

v.

ACE AMERICAN INSURANCE
COMPANY,

Defendant.

)
)
)
)
)
)
)
)
)
)

C.A. No. 1:24-cv-00817-RGA

**STIPULATION AND [PROPOSED] ORDER FOR DEFENDANT
ACE AMERICAN INSURANCE COMPANY’S RESPONSE TO
PLAINTIFF CHEMONICS INTERNATIONAL, INC.’S COMPLAINT**

Defendant ACE American Insurance Company (“ACE”) and Plaintiff Chemonics International, Inc. (“Chemonics”), by and through their undersigned counsel, hereby **STIPULATE AND AGREE** to an extension of time for ACE to respond to Chemonics’ Complaint, subject to the approval of the Court, as follows:

1. ACE shall respond to Chemonics’ Complaint (D.I. 1), on or before Monday, September 16, 2024.

Dated: August 2, 2024

POTTER ANDERSON & CORROON

By: /s/Jennifer C. Wasson

Jennifer C. Wasson (No. 4933)
Carla M. Jones (No. 6046)
Hercules Plaza, Sixth Floor
1313 North Market Street
Wilmington, Delaware 19801
Telephone: (302) 984-6000
jwasson@potteranderson.com
cjones@potteranderson.com

*Attorneys for Plaintiff Chemonics
International, Inc.*

OF COUNSEL

Barry I. Buchman
Kathleen M. Repko
Haynes Boone, LLP
800 South 17th Street, N.W.
Suite 500
Washington, DC 20006
(202) 654-4500

SMITH, KATZENSTEIN & JENKINS LLP

By: /s/ Julie M. O'Dell

Robert J. Katzenstein (No. 378)
Julie M. O'Dell (No. 6191)
1000 N. West Street, Suite 1501
Wilmington, DE 19899
Telephone: (302) 504-1650
rjk@skjlaw.com
jmo@skjlaw.com

*Attorneys for Defendant ACE American Insurance
Company*

OF COUNSEL

Alan Joaquin
Alexandra N. Kajari
WERNER AHARI MANGEL LLP
2112 Pennsylvania Avenue Northwest
Suite 200
Washington, DC 20037
(202) 599-1030
AJoaquin@wam.law
Akajari@wam.law

SO ORDERED, this _____ day of August 2024.

Hon. Richard G. Andrews